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To: [Strategy](#)
Cc: [Cllr Wedderkopp, Danny](#)
Subject: Cllrs Derek Perry and Danny Wedderkop
Date: 23 March 2020 10:23:19

Dear Nick and Strategy team,

Please find attached the stage 1 consultation response from Cllr Danny Wedderkopp and me.

Derek Perry

Somerset West and Taunton Council
Local Plan 2040
Issues and Options Consultation

A joint response by
councillors Derek
Perry and Danny
Wedderkopp.

Somerset West and Taunton
Councillors, Vivary Ward.

March 2020

Introduction and Summary

1. This is our response to SW&T's Issues and Options Consultation in respect of the 2040 local plan. We provide this response in our capacity as district councillors representing Vivary Ward. We are mindful of our duties as councillors to the wider community within the district but the primary purpose of this response is to represent the interests of the ward which we represent, as we see them. In so doing we are mindful of the number and range of responses which are likely to be received from others across the district. We hope that in maintaining focus on the issues arising from this consultation as they relate to Vivary Ward that this response will be more accessible and useful than it might be if such focus were not maintained.
2. We have also considered carefully the scope of this Stage 1 consultation in the context of the whole process towards adoption of the 2040 plan. We are conscious that further consultation will occur at Stage 2. We have sought to avoid digression into matters which are extraneous to the current consultation.
3. This response is split into three parts. In Part 1 we provide an overview of the generality of the way in which we perceive the consultation and the plan to impact upon our ward. In Part 2 we answer the specific questions posed, with an intentional emphasis on issues which affect our ward. In Part 3 we briefly discuss our views on progression of the process beyond the instant consultation.

PART 1

1. One of the distinctive geographical features of Vivary ward is the “long and thin” shape of its populated area. The northernmost end of the ward can properly be described as being part of the town centre. By contrast, the southern end of the ward abuts the M5 motorway and thus demarks the effective current outer limit of the urbanised boundary of the town of Taunton. The spine of this urbanised part of the ward is the B3170 South Road / Shoreditch Road. This serves as a secondary arterial route into Taunton for those travelling from outlying villages south of Taunton and from conurbations further afield such as Honiton and Axminster. Anecdotal evidence suggests it to be increasingly used as a diversionary vehicular route into Taunton for those wishing to avoid the A358 at peak hours. The same may be said of Stoke Road, the use of which seems to have expanded well beyond that of a route into Taunton for those travelling from the Stoke St Mary area. Thus, while the majority of the populated area of Vivary Ward is made up of suburban dwelling, its character is increasingly that of a commuter corridor into central Taunton. Allied to this is the flow of traffic along Chestnut Drive by those travelling to and from junction 25 of the M5. Richard Huish College is situated within the ward and is a major driver of commuter traffic and parking problems throughout the day, in term time at least.
2. Perhaps the most important characteristic of Vivary ward, certainly from an environmental and planning perspective, is the green wedge. The significance and importance of the green wedge to the communities which abut it and to Taunton as a whole are difficult to understate. Much has been said and is documented as to these matters and it is not the

purpose of this document simply to repeat them. Suffice to say, by way of summary, that the Vivary green wedge is a precious and somewhat unique feature performing the role of a green “lung” linking the open countryside to the south right into the centre of the town. Development at Killams has been controversial with many perceiving it to be an unjustified encroachment into the green wedge.

3. Within the effective “footprint” of the currently populated part of the ward, the area that might be available for large scale development without major changes is, in truth, limited. Thus, without wishing to diminish the importance of the local plan as it might affect individual small scale developments, it seems to us that the particular interests of our ward which need to be recognised and protected within the consultation and plan are essentially twofold, namely:

- i. To prevent or to limit significant development to the south of our ward, i.e. south of the M5, and in so doing to prevent the ward becoming overwhelmed with vehicular traffic and suffering the negatives effects thereof;
- ii. To protect the green wedge.

These matters are at the forefront of our minds in providing our answers to the specific questions in part 2.

Part 2: Answers to questions posed

Q 1a: This is a question of general relevance but of great importance. Our view is that the aim should be to achieve this as soon as possible. While we recognise that this may impose additional challenges, that has to be weighed against the magnitude and urgency of the situation which these measures are deigned to address. The climate emergency is precisely that: an emergency. We should not allow this phrase to become a mere cliché or platitude. The economic interest of developers may well militate towards claims that 2025 is unrealistic. We should be reluctant to accept such claims. If we are serious about tackling climate change then urgent rethinking of the way things are done is necessary. Human ingenuity and capacity to adapt, when forced, is great. If we fail to act decisively then future generations will not forgive our complacency.

Q1b: It is difficult to answer this binary question without further discussion as to how each option might translate into *actual* low carbon and renewable infrastructure. If allocation of specific sites somehow guarantees that those sites will be used then we would favour this approach but would encourage ambition in the number and scale of sites combined with a strong preference for the use of existing or former industrial sites for those developments, where possible. However, we are concerned that identification of specific sites might inhibit flexibility. This would be particularly unfortunate if development of identified sites fails to come to fruition.

Q1c: So far as 1c/1 is concerned, we endorse this approach but would wish to ensure that this does not lead to a narrowly construed approach to carbon reduction / neutrality in which creative and misleading calculation of the

carbon impact of individual projects allow for hollow claims. We support 1c/2 but think it should go further. Actual electric charging points should be mandated, not simply the cabling to permit later installation thereof. Solar panels or tiles should be mandated on all new properties and the requirements as to capacity and performance should be rigorously specified to avoid developers doing the bare minimum. 1c/3 is a laudable aim and we support it subject to the caveat that such work should not detract from the potentially greater positive impact of other projects. Care will be required before scarce resources are expended and purely symbolic projects with minimal marginal gain should be avoided where greater overall benefit can be achieved elsewhere. 1c/5 and /6 get our support but should be meaningfully incentivised or, if necessary and possible, mandated. The wider impact of such policies is well known and we are concerned that opportunity may be lost if these words are not backed with sufficient energy and resource. We support 1c/7 but again stress that specification of any measures needs to be rigorous and ambitious.

Q2a: Yes

Q2b: As councillors for Vivary Ward we express no view on this subject.

Q2c: We have no fundamental objection to the continuance of the existing proportional distribution. We note that this distribution will mean that Taunton accounts for over two thirds of housing in the plan. Part of the rationale for it bearing such a large proportion is that it is the “most sustainable place”. That description is undoubtedly apt when it comes to proposed development at sites such as Firepool and at others which are within walking distance of both central amenities and meaningful public

transport connections. There should be a strong preference for development in such locations. By contrast however, certain sites which might properly be described as being within Taunton but on its outer limits may be some of the least sustainable of all in that public transport connectivity and local amenity provision is such that increased use of cars is inevitable. If the actual number of genuinely sustainably located homes within Taunton is such that Taunton can, without accepting development in unsustainable locations, accept a larger proportion of new homes then option 2cii might be acceptable. This would be far more likely to be the case if following this option reduced the pressure to accept new homes in undesirable numbers in inappropriate rural / village locations. In this regard, as councillors for Vivary ward the “elephant in the room” is the threat of development south of the M5 on the land recently acquired by Taylor Wimpey from The Crown Estate. The scale of development feared at this location would fly in the face of the objectives set out in section 4. For example, its environmental impact would be contrary to the carbon neutrality target (option 1). It would undermine the self-containment of Taunton as a town (objective 2). Realistically, there is little chance of such development complying with objective 5 and it would have the opposite effect to objective 6. Its environmentally destructive effect would be contrary to objective 7. With this in mind, we are concerned to see reference to an “M5 corridor” in option 2c vi. The implication of this phrase is that development may occur on either side. As noted in the introduction to this response, the southern boundary of Vivary ward *is* the M5 and demarks the current urban limit of Taunton. If the integrity of this boundary is not maintained then the swallowing up of outlying settlements, loss of the character thereof and creeping rural destruction is inevitable. Such development would bring with it an unacceptable increase in the negative effect of commuter traffic which

already blights our ward. We are conscious that this stage of the consultation does not relate to specific sites. However, if proper regard is not had to distribution at this stage then the consequences will be felt later when the time comes for identification of sites.

Q2d: We believe that our answer to Q2c above addresses this question also.

Q3a: Our general view is that the number should be higher, if possible. However, in light of our view that the scope for significant development *within* our ward is minimal we offer no further comment at this stage.

Q3b: We do not consider that there would be potential for any such development within our Ward. However, the sites which are identified should be such that the opportunity for opportunistic development is minimised.

Q3c: Our instinctive answer would be “yes” but we are concerned that the market, particularly in the longer term, might not be effective in ensuring that such properties become inhabited by those whose needs they are designed to meet.

Q3d: Yes. Yes, but subject to rigorous oversight and review over time.

Q3e: We agree with each of these approaches.

Q4a: We prefer option 4a i. Our district, like many others in the regions, suffers from “brain drain” amongst the young in spite of its lifestyle advantages and good connectivity. Average age is higher than the national average. High quality jobs are the key to future prosperity.

Q4b: In our view the rapid and inevitable change in the way in which people work and shop militates in favour of some shift. If employment sites for which there is little demand can be repurposed for residential development in a way which is sustainable then that is no bad thing. Option 4b iv) provides flexibility which may necessary to accommodate variability in the speed of change. But, if adopted, criteria would have to be rigorous, detailed and applied in a manner which prevents unacceptable loss of employment sites for purely pecuniary benefit.

Q4c: Each of these approaches is superficially attractive and we are generally supportive of them. The wording of some (e.g. 4c/1 and 2) is somewhat generalised and we trust and expect that greater detail will follow to ensure that these objectives do not become hollow in their meaning. We are attracted by the idea of communal work hubs as set out in 4c/4 but are less attracted by the idea of a requirement for home offices. In truth, those who work from home these days increasingly do so without the need for a designated office and, if they do, can allocate a room or area for that purpose with relative ease. The ability to work from home undoubtedly depends on availability of good broadband, but the physical “office” requirement is largely determined by how an occupier chooses to use the space available to them. We needn’t make 20th century provision to satisfy 21st century requirements. 4c/6, 7 and 8 are relevant in view of the changing face of our Taunton town centre, of which part of our ward effectively forms a part. It is no secret that town centres across the land are suffering. There are many contributory factors but the move towards online shopping clearly plays a role and represents an inevitable general trend. It may well be, therefore, that the number of retail units which Taunton town centre can support is smaller than was previously the case

and may well reduce further. Accordingly, we see merit in consolidating the town centre offering by encouraging the geographical concentration of viable retail and leisure outlets. If so doing frees up buildings for housing, then there is the potential to increase the number of people for whom the town centre is their local community and who support its businesses without having to drive into it.

Q5a: There can be no easy answer as to the balancing of these competing priorities. However, the magnitude of the climate emergency and the ill effects of previous, unsustainable development is such that in our view high priority must be given to design and sustainability.

Q5b: These all appear sensible to us.

Q6a: The temptation is to answer question 6a in a way which goes beyond the scope of what can be achieved through planning policy. In reality, the measures proposed in objective 6b go some way to answering question 6a, but we feel that development needs to be located in such a way that it is cost effective to provide meaningful and reliable public transport for the people who move in, whether it be by improved bus provision or reinstatement of lost rail infrastructure. We should seek to move away from a tension between the need for high subsidy on one hand and acceptance of non-provision on the other. As regards cycling, we would stress that merely requiring the provision of a cycle route is of limited value unless that cycling route is genuinely of good enough quality to lure commuters away from cars. Taunton, like many other towns, has numerous meandering, incomplete and, occasionally, badly set out cycling routes. In Vivary ward we have such an example. It is possible to cycle from Killams to town by avoiding major roads. But the route is

hardly the kind of cycle highway which is likely to draw commuters away from cars en masse. There should in future be rigorous requirements that cycle routes be wide enough, direct enough, minimise the need to stop to give way or check priority and be of smooth high quality surface. A cycle route which is pleasant and safe enough to pootle along with the family of a weekend is not necessarily good enough to achieve significant modal shift among commuters. When people can safely and comfortably cycle along such routes at continuous speeds of 15-20mph then the incentive for commuters to use them will be meaningful.

Q7a: It must be underlined that the objective of increasing biodiversity is inconsistent with large scale development in places of existing high environmental amenity such as in the Blackdown Vale where Taylor Wimpey has acquired its land from the Crown Estate. Beyond that, ambitious tree planting requirements, (re)instatement of hedgerows, wildflower meadows and corridors, integration of aquatic environments.

Q7b: We are generally supportive of each of these measures.

Q8a: For the reasons set out in our response to question 2c, it is our view that the settlement boundary to the South of Taunton in particular should be protected. To do otherwise would risk potentially limitless creeping development which swallows up outlying villages and fundamentally and unacceptably undermines the social and environmental character of those areas while overwhelming the part of Taunton which we represent, and others. The threat of this occurring is plainly now very real and the maintenance of the settlement boundary, along with allocation, is of key importance. As regards settlements remote from our ward, we think it proper to defer to those whose interest in those areas is greater than ours.

Q8b: We are concerned that any criteria based system for countryside areas would struggle to be sufficiently rigorous to guarantee that circumvention so to as to permit unacceptable large scale development in areas such as the Blackdown Vale does not occur. Thus, while we understand the theoretical benefit of the flexibility which a criteria based policy could provide, we fear that the risks outweigh the benefits.

Q9a: We are generally supportive of the approaches but note that at this stage that appear somewhat aspirational. We are particularly supportive of the principle of strengthening self containment of settlements in 9a/4.

Q10a: We have touched upon this earlier in this document. Development of available brownfield sites is quite obviously the key.

Q10b: We support them and have directly or indirectly addressed a number of them earlier in this document.

Q11a: In our capacity as councillors for Vivary Ward we make no comment in response to this question.

Q11b: As above.

Part 3: Discussion

In general terms, we feel that the content of the Issues and Options Document, particularly the proposed policy approaches, is positive. In part 1 of this response we set out how, in our view, we see that the local plan could most significantly affect our ward. It seems to us that with the prevailing emphasis

on environmental protection, sustainability, consolidation of Taunton town centre and protection of individual settlements that the plan ought to go a long way to safeguarding the interest we set out, i.e. preventing unacceptable development south of the M5 and protecting the Vivary green wedge. If it does not do so then something will have gone very wrong. We do however reiterate our concern that certain aspects of the document seem to leave the door potentially ajar to the kind of development which we regard as unacceptable. The phrase “M5 corridor” carries a potentially worrying implication and the proposal to provide a criteria based system for countryside development could, in our view, possibly be exploited. We hope that reflection on our concerns will lead to appropriate protections.

Cllr Derek Perry.

Cllr Danny Wedderkop.